

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CHRISTOPHER MANHART, *individually and  
on behalf of all others similarly situated,*

*Plaintiff,*

v.

NATIONAL STUDENTS FOR JUSTICE IN  
PALESTINE, A PROJECT OF WESPAC  
FOUNDATION, INC.; WESPAC  
FOUNDATION, INC.; DISSENTERS; JEWISH  
VOICE FOR PEACE; TIDES CENTER, D/B/A  
COMMUNITY JUSTICE EXCHANGE; JINAN  
CHEHADE; SUPERIOR MURPHY; RIFQA  
FALANEH; AND SIMONE TUCKER,

*Defendants.*

No. 1:24-cv-8209

District Judge Mary L. Rowland

Magistrate Judge Keri L.  
Holleb Hotaling

**DEFENDANT TIDES CENTER D/B/A COMMUNITY JUSTICE EXCHANGE’S MOTION  
FOR SANCTIONS PURSUANT TO RULE 11  
OF THE FEDERAL RULES OF CIVIL PROCEDURE**

Defendant Tides Center d/b/a Community Justice Exchange (“CJE”), by and through its attorneys, and pursuant to Rule 11 of the Federal Rules of Civil Procedure, hereby respectfully moves this Court for Rule 11 sanctions against Plaintiff and Plaintiff’s counsel. In support of this motion, CJE submits the accompanying memorandum of law, and states as follows:

1. On January 29, 2025, Plaintiff and his counsel filed the Second Amended Verified Complaint (ECF 69) (the “SAC”) in violation of Rule 11(b) of the Federal Rules of Civil Procedure, which provides in pertinent part: “(b) REPRESENTATIONS TO THE COURT. By presenting to the court a pleading, written motion, or other paper—whether by signing, filing, submitting, or later advocating it—an attorney or unrepresented party certifies that to the best of the person’s

knowledge, information, and belief, formed after an inquiry reasonable under the circumstances: (1) it is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) the claims, defenses, and other legal contentions are warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law . . .” Fed. R. Civ. P. 11(b).

2. Specifically, the SAC (1) is not grounded in or supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law; and (2) was filed for an improper purpose, mainly to harass CJE. This motion is supported by the accompanying memorandum of law in support.

3. Pursuant to Rule 11(c), CJE served this motion and the accompanying memorandum of law in support on Plaintiff’s counsel on February 3, 2025, 21 days before CJE filed it with this Court.

4. This is the third time that CJE has notified Plaintiff and his counsel of their violations of Rule 11, and each time they have refused to withdraw their frivolous claims against CJE. This time it is no different. After receiving this motion and accompanying memorandum of law in support, Plaintiff and his counsel failed to withdraw the SAC as to CJE.

5. Because of Plaintiff and his counsel’s improper conduct, CJE has incurred substantial attorneys’ fees and costs in connection with this action.

WHEREFORE for all the reasons stated in this motion and accompanying memorandum of law in support, Defendant CJE respectfully requests that this Court enter an order (1) sanctioning Plaintiff and his counsel; (2) awarding Defendant CJE reasonable attorneys’ fees and costs incurred in connection with this action; (3) dismissing the SAC with prejudice against CJE; and (4) ordering any other sanctions or relief that the Court deems proper.

Dated: February 25, 2025

Respectfully submitted,

/s/ Precious S. Jacobs-Perry

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